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6 UNITED STATES DISTRICT COURT  
 7 DISTRICT OF NEVADA

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8 JULIE HANNA, ) Case No.: 2:21-cv-00639-JCM-BNW  
 9 vs. ) Plaintiff, )  
 10 ) Stipulation and Order to Extend Deadline for  
 11 K-KEL, INC.. a Nevada Corporation; DOES I- ) Discovery Period  
 12 X; and, ROE Business Entities I-X, Mark ) [Third Request]  
 13 Broadhurst, Mike York, and Chase Swanson. ) Defendants.  
 14 )  
 15 )

16 Pursuant to Local Rules 6-1 Defendant K-Kel, Inc. (“Defendant”) and Plaintiff Julie Danou  
 17 Hanna (“Plaintiff”), by and through their undersigned counsel, hereby stipulate to amend the Order  
 18 Granting Stipulated Extension of Deadlines (ECF No. 33) as follows:

19 Expert Disclosure Deadline	April 9, 2022
20	
21 Rebuttal Expert Disclosure Deadline	May 9, 2022
22	
Discovery Deadline	June 8, 2022
23	
Dispositive Motion Deadline	July 8, 2022
24	
Joint Pretrial Order Deadline	August 8, 2022 or 30 25 days from a ruling on a dispositive motion
26	

27 1 However, the parties have agreed that any defense rebuttal expert report relating to the report of Plaintiff’s expert, Ryan S.  
 Shugarman, will be submitted by April 9, 2022.

This is the third request for an extension to the discovery plan and scheduling order in this matter. The requested extension is sought in good faith and not for purposes of undue delay.

**DISCOVERY COMPLETED TO DATE**

The parties have exchanged initial disclosures pursuant to FRCP 26(a)(1). Plaintiff has served written discovery upon the Defendant, and Defendant has provided responses. Defendant has served written discovery on Plaintiff and responses are not yet due. Defendant has subpoenaed five sets of medical records. Plaintiff has served an expert witness report and Defendant has identified an expert it would like to use. The parties have agreed that the Plaintiff's responses are due February 14, 2022, and February 16, 2022. Plaintiff has noticed depositions for February 16, 17, and March 1, 2022.

## **DISCOVERY REMAINING**

The deposition of Plaintiff and other parties, current and former employees of Defendant, experts and potentially other persons, as well as possible further written discovery.

## **REASON FOR EXTENSION OF DISCOVERY**

In addition to general complications from dealing with the global pandemic and restrictions of COVID-19, Plaintiff's contested motion to file a First Amended Complaint was granted on January 20, 2022 (ECF No. 39), adding three individual defendants to the case. It was prudent that depositions not proceed until it was resolved whether new parties would be added. Also, these parties need to be served before any discovery can be taken from them. As for the rebuttal expert deadline, Defendant has identified a rebuttal expert it would like to use, but that person could not prepare a report within the existing deadline due to his schedule, and not all medical records of Plaintiff have been produced yet in response to the subpoenas that have been propounded.

1                   **PROPOSED DATE FOR THE COMPLETION OF DISCOVERY**

2                   The parties presently believe they can complete discovery by the proposed new date of June 8,  
3                   2022.

4                   Respectfully submitted,

5                   DATED 1/28/2022

6                   /s/ Kathryn Back

7                   Kathryn Black, Esquire  
8                   Pro Hac Vice Admission  
9                   Attorney for Plaintiff

10                  /s/ Scott Mahoney

11                  Scott Mahoney, Esquire  
12                  Nevada Bar No. 1099  
13                  Attorney for Defendant

14                   **ORDER**

15                   IT IS SO ORDERED.

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18                  UNITED STATES MAGISTRATE JUDGE

19                  Dated: January 31, 2022